



Vince Ryan  
Harris County Attorney

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April 2, 2014

Ms. Anne Foster  
United States Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202

Re: San Jacinto Superfund Site

Dear Ms. Foster:

Harris County has recently identified the attached information regarding the San Jacinto Superfund Site that raises concerns about the integrity and objectivity of information being provided to the public and the EPA in connection with the Site, and upon which EPA is being asked to rely upon in making future critical decisions that will impact the health and welfare of the citizens of Harris County.

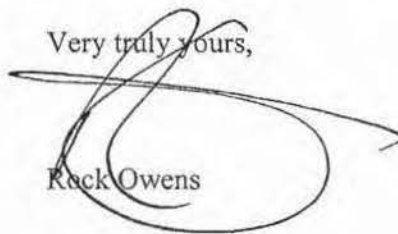
The attached document reflects discussions between Waste Management and International Paper regarding a "global plan" to influence the public, improperly pre-determine the site remedy and to interfere with EPA's ability to speak freely to the public at community meetings designed to provide unbiased information regarding the dioxin contamination in their neighborhoods at the San Jacinto Site. The document also identifies the involvement of their consultant Anchor QEA in their efforts to influence the public to accept the least-costly site remedy that it appears that they have pre-selected three years before completing what is required to be an objective investigation and study to evaluate potential cleanup alternatives. The draft Feasibility Study conducted on their behalf by their consultant Anchor QEA was provided to EPA on March 2014. However, in March of 2011, a Waste Management official discusses the responsible parties' efforts to "control their message" to the public so that the community action group members will view the temporary rock cap as part of the permanent remedial action at the site. The Waste Management official advises the International Paper Senior Project Manager that Waste Management is "working on a global plan to build this consensus with all stakeholders and David [the Anchor project manager] is the best spokesperson to address this group and control our message. ValMichael [the EPA's Remedial Project Manager] will not speak out of turn when David is present because he knows he will be called out immediately. We need to control our message and build consensus [are] we may be facing a dig and haul/burn as part of the final remedy." Harris County is providing this information to EPA because it calls into question the objectivity of the Responsible Parties' commitment to the process and to the reliability of the information produced by Anchor, their experts.

The availability of unbiased information to the public is a critical component of the process, as well as ensuring that the information in the studies and testing that is the basis of evaluating the permanent remedy at the Site is not slanted or interpreted so as to influence the outcome. This

information about the global plan of the Responsible Parties and their consultant (who together control the data interpretation and conclusions of the Feasibility Study) to influence the outcome raises serious questions about the integrity of the Study and the work performed at the Site by those parties.

Harris County recommends that EPA evaluate whether to undertake an investigation regarding the integrity of the community relations process and to evaluate the objectivity of the underlying reports and information being provided to the EPA and the public by Waste Management, International Paper and Anchor Environmental that are the basis for future critical decisions regarding public health and exposure.

Very truly yours,

A handwritten signature in black ink, appearing to be "Rock Owens", written over the typed name.

Rock Owens

Cc: Ms. Pam Phillips (EPA)

Attachment